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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PT JAWA TIRTAMARIN,

Plaintiff,

vs.

PT PERTALAHAN ARNEBATARA NATUNA,

Defendant.

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: Index No.: 07-CV-6839 (HB)
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: **NOTICE OF MOTION FOR**
: **DEFAULT JUDGMENT**
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PLEASE TAKE NOTICE that Plaintiff PT Jawa Tirtamarin, by and through its attorneys Hill Rivkins & Hayden LLP, upon the annexed Affirmation of Christopher M. Panagos dated January 29, 2008, and the exhibits attached thereto, the accompanying Memorandum of Law and all the pleadings heretofore had herein, hereby moves this Court before the Honorable Judge Harold Baer, Jr., at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order entering judgment by default against Defendant PT Pertalahan Arnebatara Natuna and recognizing and enforcing the foreign arbitration award issued by the Singapore International Arbitration Centre on July 13, 2007 (Award No. 18 of 2007) in favor of Plaintiff PT Jawa Tirtamarin and against Defendant PT Pertalahan Arnebatara Natuna and for such other and further relief as this Court may deem just and proper.

Dated: New York, New York
January 29, 2008

A handwritten signature in black ink that reads "Christopher M. Panagos". The signature is written in a cursive, flowing style.

Christopher M. Panagos (CP-2199)
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TO:

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